

JACQUES A. BRONZE  
LAW OFFICES OF BRONZE & TANG, P.C.  
BankPacific Building, Suite 201  
825 South Marine Drive  
Tamuning, Guam 96913  
Telephone No.: (671) 646-2001  
Facsimile No.: (671) 647-7671

FILED  
DISTRICT COURT OF GUAM  
**NOV 06 2003**  
MARY L. M. MORAN  
CLERK OF COURT

(4)

Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU )	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S )	
INC., a Guam corporation, )	
)	
Plaintiffs, )	<b>DECLARATION OF JACQUES</b>
)	<b>A. BRONZE IN SUPPORT OF</b>
v. )	<b>EX PARTE APPLICATION</b>
)	<b>AND MOTION FOR ORDER</b>
)	<b>GRANTING HSBC</b>
HONGKONG AND SHANGHAI )	<b>ADDITIONAL TIME TO</b>
BANKING CORPORATION, LTD., )	<b>RESPOND TO COMPLAINT</b>
et al., )	<b>[L. R. 7.1(j)(1)]</b>
Defendants. )	
_____)	

I, JACQUES A. BRONZE, do hereby declare as follows:

1. I am over the age of eighteen (18) years and competent to make this Declaration. I have personal knowledge of the matters stated herein and would be competent to testify thereto at any proceedings.
2. I am admitted to practice before this Court and am counsel responsible for the representation of Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC"). A good faith effort has been made by co-counsel to advise counsel for Plaintiffs of the date, time, place, and substance of HSBC's Ex Parte Application

**ORIGINAL**

**Sadhwani, et al. v. Hongkong and Shanghai Banking Corporation Ltd., et al.**  
**Civil Case No. 03-00036**  
**Declaration of Jacques A. Bronze in Support of Ex Parte Application and Motion for Order Granting HSBC**  
**Additional Time to Respond to Complaint**  
**Page 2 of 2 pages**

and Motion for Order Granting HSBC Additional Time to Respond to Complaint ("Ex Parte Application").

3. Counsel for Plaintiffs has indicated that he opposes the Ex Parte Application and desires to be present when the Ex parte Application is presented to the Court, as shown in Attorney Joaquin C. Arriola's facsimile memorandum of November 5, 2003, a true copy of which is attached hereto as Exhibit "A" and incorporated herein by this reference.

4. It is important and urgent that the Ex Parte Application be heard as soon as possible because HSBC would be required to answer or otherwise respond to the Complaint by November 12, 2003, unless an extension is granted, which Plaintiffs and their counsel have refused to do.

5. This Declaration is made in compliance with Local Rule 7.1(j)(1).  
I declare under penalty of perjury under the laws of the United States and Guam that the foregoing is true and correct.

Dated this 6<sup>A</sup> day of November, 2003.

  
\_\_\_\_\_  
JACQUES A. BRONZE

RAP/nsh

## Law Offices

**Arriola, Cowan & Arriola**

Joaquin C. Arriola  
Mark E. Cowan  
Anita P. Arriola  
Joaquim C. Arriola, Jr.

259 Martyr Street, Suite 201  
C & A Building  
Post Office Box X  
Hagåtña, Guam 96910

Telephone: (671) 477-9730/3  
Telecopier: (671) 477-9734  
E-mail: acalaw@ite.net

Jacqueline T. Terlaje

**TELECOPIER COVERSHEET**

TO: **Richard A. Pipes, Esq.** DATE: **November 5, 2003**  
Law Offices of Richard A. Pipes

FAX NO. **647-7671**

FROM: **Joaquin C. Arriola**

RE: **Alan Sadhwani, et. al. vs. Hong Kong Shanghai Banking; CV1560-03**

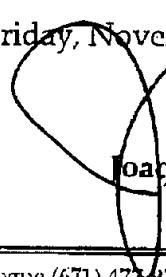
**TOTAL PAGES TRANSMITTING (INCLUDING COVER SHEET):**

**CONFIDENTIALITY NOTICE.** The information in this facsimile is intended for the use of the addressee only. It may contain information that is privileged, confidential, and exempt from disclosure. If the reader of this message is not the intended recipient or an employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that a dissemination, distribution or copying of this communication is strictly prohibited. If you have received this facsimile in error or if there is a transmission error, please notify us immediately by telephone and return the original message to us by mail. Thank you.

Richard:

We will of course oppose any motion by Hongkong & Shanghai Banking Corporation for extension of time within which to Answer, or Respond to the Request for Production or Answers to Interrogatories. My clients are under tremendous pressure to make the monthly payments of \$75,000 demanded by the purported Buyer.

I will not be available after 3:00 p.m. this afternoon, but I will be available all day tomorrow, Thursday, November 6, 2003 and Friday, November 7, 2003 from 8:00 a.m. to 5:30 p.m.

  
**Joaquin C. Arriola**

JCA/dmg

If there is a problem with transmittal, please call Donna M. Gogue (671) 477-9730/33. Fax No.: (671) 477-9734

**EXHIBIT** 